

KML LAW GROUP, P.C.

A Professional Corporation incorporated in Pennsylvania

701 Market Street, Suite 5000

Philadelphia, PA 19106

(215) 627-1322

Attorneys for MidFirst Bank

IN THE MATTER OF:

Michael S Fisher

DEBTOR(S),

**IN THE UNITED STATES BANKRUPTCY
COURT FOR THE DISTRICT OF NEW
JERSEY**

CHAPTER 13
CASE NO. 18-34110 MBK

**STATEMENT AS TO WHY NO BRIEF IS
NECESSARY IN ACCORDANCE WITH
“LOCAL RULES OF BANKRUPTCY
PRACTICE” RULE 3(C)**

The within Notice of Motion requests relief from the automatic stay on the grounds, as set forth on the accompanying Certification, that the debtor(s) have failed to maintain their monthly mortgage payments to the Secured Creditor.

As the facts the secured creditor relies upon, as set forth on the accompanying certification, and the basis for relief from the automatic stay, do not present complicated questions of fact or unique questions of law, it is hereby submitted that no brief is necessary in the Court's consideration of the within Motion.

DATED: May 04, 2023

/s/Denise Carlon

Denise Carlon, Esquire

KML Law Group, P.C.

701 Market Street, Suite 5000

Philadelphia, PA 19106

(215) 627-1322

dcarlon@kmlawgroup.com

Attorney for MidFirst Bank